

EXHIBIT B

Pages 1-50

Highlighted Comparison of Plaintiffs' Original and
Amended Exhibit List

From: Carrie Hill [<mailto:chill@sgpblaw.com>]
Sent: Thursday, June 11, 2015 6:34 PM
To: Addie Ries; Kevin Paul
Cc: Kirk Warner
Subject: RE: YATES

From: Addie Ries [<mailto:aries@smithlaw.com>]
Sent: Thursday, June 11, 2015 1:16 PM
To: Carrie Hill; Kevin Paul
Cc: Kirk Warner
Subject: RE: YATES

Carrie/Kevin,

Can you please highlight what is new on your amended exhibit list (or send a word version of both so we can run a redline comparison)?

Thanks,
Addie

ADDIE K S RIES
aries@smithlaw.com | [bio](#) | [vcard](#)
P 919.821.6710 | F 919.821.6800



Smith, Anderson, Blount, Dorsett, Mitchell & Jernigan, L.L.P.
Wells Fargo Capitol Center
150 Fayetteville Street, Suite 2300 | Raleigh, NC 27601
P.O. Box 2611 | Raleigh, NC 27602-2611
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From: Carrie Hill [<mailto:chill@sgpblaw.com>]
Sent: Wednesday, June 10, 2015 9:48 PM
To: Chris Kiger; Jessica Floyd Middlebrooks; jwalters@davisandhamrick.com; Kirk Warner; ldavis@davisandhamrick.com; swainger@mcquirewoods.com; Cheryl Bona; Addie Ries; Holly.hempel@nelsonmullins.com; bbishop@wilsav.com; kgreene@wilsav.com; starry@mcquirewoods.com
Cc: Kevin Paul; Janet Ward Black; Nancy Rudd (nrudd@wardblacklaw.com); Laurie Canham
Subject: YATES

Attached is Plaintiffs' Amended Rule (a)(3) Disclosures, along with Exhibit List attached as Exhibit A, being served to you via email, in the Yates case.

Carrie Hill | Paralegal to Rachel Moussa and Kevin Paul

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PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description		Admitted	Denied	Limited
	Exhibit No				
		General Exhibits			
1	1898	Chief Inspector of Factories, "Annual Report of the Chief Inspector of Factories and Workshops for the Year"			
2	1918	Imboden - "The American Journal of Roentgenology"			
3	7/26/1924	"Fibrosis of the Lungs Due to the Inhalation of Asbestos Dust," W.E. Cooke, <i>The British Medical Journal</i> , pp. 147-8, July 26, 1924			
4	12/3/1927	"Pulmonary Asbestosis," W.E. Cooke, <i>The British Medical Journal</i> , pp. 1024-25, December 3, 1927			
5	1930	"Report on Effects of Asbestos Dust on Lung & Dust Suppression in Asbestos Industry," Merewether & Price (SA 23)			
6	1930	"The Occurrence of Pulmonary Fibrosis and Other Pulmonary Affections in Asbestos Workers," by Merewether. <u>The Journal of Industrial Hygiene</u> , Vol XII.			
7	1932	Memorandum on the Industrial Diseases of Silicosis and Asbestosis			
8	1934	Exemplar book excerpts, <u>Dust</u> by S. Cyril Blacktin, pp. 228-255, Copyright 1934. "Property of Tennessee Valley Authority Fertilizer Works Library"			
9	1935	Memorandum on the Industrial Diseases of Silicosis and Asbestosis (WK FSOA 5102)			
10	1935	"Carcinoma of Lung in Asbestos- Silicosis", Lynch and Smith (SA 48)			
11	1935	Exemplar book: National Medical Monographs, "Industrial Medicine," by Clark & Drinker. Copyright 1935.			
12	1937	Bonsib Report			
13	1937	Alton Railroad Doc (RR 51)			
14	8/1938	Public Health Bulletin No. 241. "A Study of Asbestosis in The Asbestos Textile Industry," by U.S. Treasury Dept.			
15	1938	Exemplar book, "Cause and Prevention of Disease," by Dr. William H. Perkins. Copyright 1938.			
16	1942	"Occupational Tumors and Allied Diseases," by W.C. Hueper			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
17	1942	Warren Cook - "The Occupational Disease hazard" (SA 332)		
18	1942	Witham, G. Modern Pulp & Paper Making 2ND Edition. New York: Reinhold Publ. Co., 1942.		
19	1943	Bulletin of the American Society for the Control of Cancer, Inc., Vol. 25, No. 5, "Cancer in Its Relation to Occupation and Environment," by W.C. Hueper (May 1943).		
20	2/28/1943	Illinois Department of Labor. The Illinois Labor Bulletin (February 28, 1943) re asbestos dust control (also JC 295 and FC 5454)		
21	3/20/1943	"Lung Cancer in Asbestosis Patients," H.W. Wedler. German to English translation. Published in <i>Dtsch. Arch. Klin. Med.</i> 191, pp. 189-209. March 20, 1943.		
22	8/6/1943	"Asbestosis and Lung Cancer," H.W. Wedler. German to English translation. Published in <i>Deutsche Medizinische Wochenschrift</i> , pp. 575-576, August 6, 1943. [Published also in Jan. 1945 IHF Digest, p. 4 (IHF 155)].		
23	1944	Exemplar book, "The Pathology of Internal Diseases," by William Boyd. 4th Ed. Copyright November 1944, Reprinted May 1945		
24	1944	Heating & Ventilating Magazine - 6/44 (SOA 5142)		
25	1945	Southern Power and Industry Magazine- 9/45 (SOA 5138)		
26	1945	Southern Power and Industry Magazine- 12/45 (SOA 5139)		
27	1946	Southern Power and Industry Magazine- 1/46 (SOA 5140)		
28	1946	1946 Southern Power and Industry Magazine 11/46 (SOA 5141)		
29	1946	"Health Survey of Pipe Covering Operations in Constructing Naval Vessels", Fleischer/ Drinker (SA 99)		
30	1948	New York Times, "Aid for Industry Urged on Doctors."		
31	1949	Berry, Hammond, Bonsib, et al (EXX 64)		
32	1949	"Asbestosis & Cancer of the Lung", JAMA (SA 114)		
33	1950	The Merck Manual of Diagnosis and Therapy: A Source of Ready Reference for the Physician, "Asbestosis." Published by Merck & Co. 1950		
34	5/15/50	Newsweek (SA 348) Page 1 & 53		

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
34A				
35	5/15/50 1952 Newsweek (<i>in color</i>) Encyclopedia Britannica: A New Survey of Universal Knowledge- "Cancer." Vol 4. Copyright 1952.			
36	1954 New York Times, "Science in Review, Tobacco Industry Acts to Determine Whether Cigarettes and Lung Cancer are Related."			
37	1955 "Mortality from Lung Cancer in Asbestos Workers", Doll (SA 164)			
38	1955 Exemplar book, "The Diseases of Occupations," by Donald Hunter, M.D. Copyright 1955. Published by English University Press in London.			
39	1956 "Minutes of General Meeting of Asbestos Textile Institute", 3/7/56 & 3/8/56 (ATI 23)			
40	1956 "Prepared Discussion" Am. Ind. Hygiene Ass. Quarterly, Stokinger (SA 186)			
41	1958 (Feb) Article, "Asbestos." Published in American Industrial Hygiene Association Journal, Vol. 19, No. 1, pp. 161-163 (February 1958). Published by The Williams & Wilkins Company.			
42	1958 (Apr) American Industrial Hygiene Journal (April 1958)			
43	1959 Exemplar book: Health in Industry, "Diseases and accidents to which workers in industry are liable, and how they may be treated or prevented," by Donald Hunter. Published by Penguin Books Ltd. Copyright 1959.			
44	1960 Exemplar book: Modern Occupational Medicine, 2nd Ed., by Drs. A.J. Fleming, et al. Lea & Febiger publishing - Copyright 1960.			
45	1960 "Diffuse Pleural Mesothelioma & Asbestos Exposure in the Northwestern Cape Province", Wagner (SA 209)			
46	1960 "Occupational Chest Diseases," from Modern Occupational Medicine, by Fleming and D'Alonzo. 2d Ed. 1960.			
47	4/1964 Selikoff, "Asbestos Exposure and Neoplasia"			
48	1965 "Relation Between Exposure to Asbestos & Mesothelioma", Selikoff (SA 237)			
49	1965 "Occupational & Non-occupational Exposures to Asbestos", Annals of the New York Academy of Sciences, Hueper			

PLAINTIFFS' EXHIBIT LIST

	Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
50		1965 "Mesothelioma of the Pleura & Peritoneum Following Exposure to Asbestos in the London Area", Newhouse (SA 240)			
51		1965 Quebec Asbestos Mining Association Meeting Minutes, 11-29-65 <i>Authenticated by Affidavit of Margaret Baumgardner, dated 1/3/13.</i>			
52		3/2/1966 The New York Times article, "Asbestos Dust Called a Hazard To at Least One-Fourth of U.S." Date: March 2, 1966.			
53		9/10/1966 Article entitled "Asbestos: Awaiting Trial," Chemical Week, September 10, 1966. (<i>also THAN 5643 and G 541</i>)			
54		1967 QAMA Meeting Minutes, 8/10/67. <i>Authenticated by Affidavit of Margaret Baumgardner, dated 3/17/03.</i>			
55		1967 Borow, et al, "Mesothelioma and Its Association with Asbestosis"			
56		1967 "Asbestosis and Neoplasia", Selikoff (SA 236)			
57		1968 "The Work Environment of Insulating Workers", Balzer and Cooper, Am. Ind. Hyg. Assoc. Journal May-June, 1968			
58		1968 Selikoff and Churg, "Asbestos Exposure, Smoking, and Neoplasia"			
59		1968 "Current Problems of Setting Occupational Exposure Standards", Stokinger (SA 252)			
60		1974 Exemplar book, "Asbestos Workers Handbook," by George A. Davis. Copyright 1974.			
61		1975 (Sept) Publication of the Asbestos Information Association/North America, Second Annual Industry Government Conference, September 10 11, 1975. (Bates Nos. 01 0205377 532) (AIA 59). <i>Authenticated by Affidavit of B.J. Pica, dated 01/03/13.</i>			
62		1979 Mehlman, "Third Wave of Asbestos Disease"			
63		1988 Exemplar book from American Boiler Manufacturers Association (ABMA), "The American Boiler Industry, a Century of Innovation, 1888-1988" Copyright 1988. (<i>also FW 5588</i>)			
64		8/17/1994 August 17, 1994 Exxon Co. letter from James Hammond to Hans Siegel.			
65		3/11/04 Memo from Cate Jenkins to EPA IG WTC team			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
66	2011 "Rarity of Malignant Mesothelioma Prior to the Widespread Commercial Introduction of Asbestos: The Mount Sinai Autopsy Experience 1883-1910," Dr. James Strauchen. <i>Am. J. of Ind Med.</i> , pp. 1-3 (2011).			
67	2011 Exemplar: "Asbestos, Risk Assessment, Epidemiology, and Health Effects, Second Edition." Ronald F. Dodson and Samuel P. Hammar. (2011)			
68	2012 (May) RighOn Canada - "International Call for Action to Stop Intimidation of Scientists by the Asbestos Industry." By Dr. Elia Abi-Jaoude, et al. http://www.rightoncanada.ca/?p=1430 (May 2012).			
69	1/18/2013 "The Worldwide Pandemic of Asbestos-Related Diseases," Stayner, Welch, Lemen. <i>Annu. Rev. Public Health</i> 2013, 34:4.1-4.12. January 18, 2013.			
70	Industrial Hygiene Foundation Exhibits "Letter dated 1-22-35 to M.F. Judd from V. Brown with attachment: Memorandum Re Melon Institute of Industrial Research Symposium on Dust Problems", 1-15-35(IHF 1)			
71	3/21/35 "Letter dated 3-21-35 to L.R. Thompson from W. G. Hazard with attachments(IHF 109)			
72	12/4/36 Letter dated 12-04-36 to CJ Stover from Vandiver Brown. Re: "Air Hygiene Foundation of America - Membership Meeting of Nov. 24th." (IHF 3) (Bates# 00175008474 - 00175008476) <i>Authenticated by Affidavit of Margaret J. Baumgardner, 12/08/09.</i>			
73	1938 "Industrial Hygiene Digest, 10/38(IHF 123)			
74	3/23/39 Air Hygiene Foundation of America (IHF 128) (Wilkie 2)			
75	9/1939 Foundation Facts (IHF 131)(Wilkie 4)			
76	4/1940 Foundation Facts, Vol. 2, No. 4; April '40 (IHF 21)			
77	4/1941 Industrial Hygiene Digest, April 1941. (IHF 142)			
78	9/1941 Industrial Hygiene Digest (IHF 145)			
79	4/1942 Industrial Hygiene Digest (IHF 147)			
80	2/1944 Foundation Facts(IHF 152) (Wilkie 8)			

PLAINTIFFS' EXHIBIT LIST

	Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
81		3/1944 Foundation Facts(IHF 153) (Wilkie 9)			
82		1/1945 Foundation Facts(IHF 155) (Wilkie 10)			
83		9/1955 Industrial Hygiene Digest (IHF 181)(Wilkie 20)			
84		5/1964 Industrial Hygiene Digest (IHF 215) (Wilkie 28)			
85		1/1966 Industrial Hygiene Digest (IHF 224) (Wilkie 30)			
86		5/1966 Industrial Hygiene Digest (IHF 226) (Wilkie 32)			
87		8/1966 Industrial Hygiene Digest (IHF 227) (Wilkie 33)			
88		9/1966 Industrial Hygiene Digest (IHF 228) (Wilkie 34)			
89		10/1966 Industrial Hygiene Digest (IHF 229) (Wilkie 35)			
90		2/1967 Industrial Hygiene Digest (IHF 232) (Wilkie 37)			
91		8/1967 Industrial Hygiene Digest (IHF 237) (Wilkie 38)			
92		12/1967 Industrial Hygiene Digest (IHF 241) (Wilkie 39)			
93		IHF Membership List as of 1968 with JOINED dates (IHF 482)			
94		3/1969 Industrial Hygiene Digest IHF digest (IHF 40) (Wilkie 40)			
95		1970 IHF Annual report (IHF 480)			
96		10/20/83 Produced by IHF Pursuant to Order of the Court -Membership Lists (Wilkie #43)			
97		IHF Membership Cards (IHF 540)			
98		4/13/10 Affidavit of Dr. David Egilman authenticating the following IHF exhibits [IHF 1,21,40,109,111,112,113,114,117, 118,119,120,121,122,123,124,125,128, 131,142,145,147,152,153,155,181,215, 224,226,227,228,229,232,237,241,480, 540,541]. Dated April 13, 2010			
		National Safety Council Exhibits			
99	NSC 3	1934 Transactions - National Safety Council (NSC 3)			
100	NSC 141	9/1935 National Safety News (NSC 141)			
101	NSC 5	10/1936 Transactions 25 th National Safety Congress, National Safety Council (NSC 5)			
102	NSC 151	11/1936 National Safety News (NSC 151)			
103	NSC 8	1939 Transactions - National Safety Council (NSC 8)			
104	NSC 10	1941 Vol. 1, Transactions National Safety Council (NSC 10)			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
105	NSC 5002			
106	NSC 13			
107	NSC 5006			
108	NSC 102			
109	NSC 102			
110	NSC 5005			
111	NSC 14			
112	NSC 15			
113	NSC 5004			
114	NSC 16			
115	NSC 17			
116	NSC 18			
117	NSC 19			
118	NSC 20			
119	1928			
120	1933-1934			

PLAINTIFFS' EXHIBIT LIST

	Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
121		2/1933 Dust in Industry: Shop Methods and Equipment Effective in Controlling Dust Hazards, Frederick Wilson, Mechanical Engineering (ASME Publication), vol. 55, no. 2, pp. 80-2, February 1933. (ASME 5003)			
122		4/1933 Dust in Industry: The Sampling and Analysis of Industrial Dusts, J. Bloomfield, Mechanical Engineering (ASME Publication), vol. 55, no. 4, pp. 229-33, April 1933. (ASME 5005)			
123		10/1933 Mechanical Engineering, Vol. 55, Number 10. (ASM-6) (ASME 5006)			
124		1934-1935 1934-1935 Membership List of the A.S.M.E., 1934-1935, Corrected to October 10, 1934; Attachments: Care of Power Boilers, Prevention of Causes of Boiler Phrases, pp. 410-411; Forewards and committee membership lists in various editions (1937, 1935, 1933) of Rules for Construction of Power Boilers, and of Rules for Construction of Steam Boilers (1931), and of Rules for the Construction of Stationary Steam Boilers (1930) (ASME 5001)			
125		1935-1936 Index to Advertisers Catalogs, Mechanical Catalog, 1935-1936 (ASME 5022)			
126		2/1935 Mechanical Engineering, Vol. 57, Number 2. (ASM 12)			
127		3/1935 Mechanical Engineering. "Dust Control Present and Future Design Considerations," by Theodore Hatch. Vol. 57, No. 3, March 1935. (ASME 5031)			
128		3/1936 Uses and Limitations of Respiratory Protective Equipment, Philip Drinker, Mechanical Engineering (ASME Publication), vol. 58, no. 3, pp. 171-6, 03/1936. (ASME 5011)			
129		5/1939 Silicosis and Asbestosis, Books Received in Library, Mechanical Engineering (ASME Publication), vol. 61, no. 5, p. 405. (ASME 5018)			
130		ASME Geographical List of Members, United States of America. (ASM-37)			

PLAINTIFFS' EXHIBIT LIST

	Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
131		1940			
132		1/1953			
133		7/1963			
134		1919			
135		1936			
136		3/6/1936			
137		3/16/1936			
138		1939			
139		1942 (Apr)			
140		2/2/1943			
141		1944			

Authenticated. Committee membership and complete list of members, Membership List: Including Society Records, Part 1, 1940, and Professional Service Index. (ASME 5013)

ASME Membership List, January 1953. (Includes Affidavit of Authentication from Devertt Bickston, May 9, 2006). (ASME 5029)

ASME Membership List, July 1963. (Includes Affidavit of Authentication from Devertt Bickston, May 9, 2006). (ASME 5030)

Government Regulations

The Commonwealth of Massachusetts, "Workmen's Compensation Act," Chapter 751, Acts of 1911, and Amendments to End of the Legislative Year of 1919. By: Industrial Accident Board (1919).

Dust, Fumes, Vapors and Gases, Safety Orders - California Excerpts from Laws of the State of Illinois, Enacted by the Fifty-Ninth General Assembly at the First Special Session. March 6, 1936

Health and Safety Act and the Health and Safety Rules. Rules A-M of the State of Illinois Industrial Commission. Approved March 16, 1936. Exhibit 4 to the deposition of Eugene Sweeney taken 8/28/08.

Pennsylvania Occupational Disease Act of June 21, 1939. Act No. 284, P.L. 566

"Transactions of the Fifth Annual Meeting of the National Conference of Governmental Industrial Hygienists," (April 9-10, 1942).

The Illinois Labor Bulletin, February 28, 1943, "Wartime Operations Emphasize Industrial Hygiene Problems of Asbestos Industry."

New Jersey Workers' Compensation statute, Chapter 88, pp. 186-191 - Laws of 1944.

PLAINTIFFS' EXHIBIT LIST

	Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
142					
143	1946	Ohio TLV (with authenticating affidavit of Susan H. Banshefsky, dated 5/9/83)			
144	1949 (Feb)	Recommended Practices Material Data Sheet on Asbestos - "Asbestos May Cause Asbestosis," Report done by the Massachusetts Department of Labor & Industries, February 1949.			
145	1952	Walsh Healey Act			
146	1960	Federal Register, Vol. 25, No. 251, December 28, 1960. Title 41/Chapter 50/Part 50-204 - "Safety and Health Standards for Federal Supply Contracts."			
147	1952	"Purdon's Pennsylvania Statutes Annotated, Permanent Edition, Title 77, Workmen's Compensation, §§ 701 to End." Copyright 1952 by West Publishing Co.			
148	1957	Texas TLV			
149	1958	New York Industrial Code Rule No. 12, adopted TLV. 1958			
150	8/17/1965	Document from the Pennsylvania Department of Health titled "Chapter 4, Article 432 - Regulations Establishing Threshold Limits in Places of Employment" adopted October 27, 1961 and revised August 17, 1965.			
151	1972	OSHA Asb Regs			
152	1973	Minnesota, §325F.01, Powdered Asbestos Ban; penalty.			
153	1974	Title 296 WAC 296-62-07517: Labor and Industries/ "Asbestos" (1974)			
154	1986	OSHA Asb Regs			
155	1976	NIOSH Revised Recommended Asbestos Standard, December 1976.			
156	12/15/77	Consumer Product Safety Commission "Consumer Patching Compounds and Artificial Emberizing Materials (Embers and Ash) Containing Respirable Free-Form Asbestos. Banned			
157	1980	NIOSH Publication No. 81-103, "Workplace Exposure to Asbestos, Review and Recommendations." NIOSH-OSHA Asbestos Work Group (April 1980)			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
158	11/25/1983	29 CFR § 1910.1200, "Hazard communication." November 25, 1983.		
159	1984	"Asbestiform Fibers, Nonoccupational Health Risks," by Committee on Nonoccupational Health Risks of Asbestiform Fibers, Board on Toxicology and Environmental Health Hazards and Commission on Life Sciences and National Research Council.		
160	7/12/89	EPA (40 CFR Part 763)		
161	8/10/94	8/10/94 Federal Register		
162	2000	"A Guide for Ship Scrappers: Tips for Regulatory Compliance." Prepared for the Environmental Protection Agency (Summer 2000)		
163	2002	"Asbestos Standard for the Construction Industry," OSHA 3096 (Revised) 2002. John L. Henshaw, Asst. Secretary		
164	2006 (Jun)	Missouri Dept of Natural Resources, "Asbestos: What is it and why is it a concern?" Air Pollution Control Program fact sheet, June 2006.		
165	2/29/2008	Federal Register, Dept. of Labor "Asbestos Exposure Limit; Final Rule." Vol. 73, No. 41. Date: February 29, 2008.		
166	12/14/2011	EPA Report, "Early Warning Report: Use of Unapproved Asbestos Demolition Methods May Threaten Public Health." Report No. 12-P-0125. December 14, 2011.		
167	2013	"Asbestos," US Dept of Labor, OSHA website: https://www.osha.gov/SLTC/asbestos . (2013)		
168	10/24/2013	"OSHA releases new resources to better protect workers from hazardous chemicals," US Dept of Labor, OSHA News Release. October 24, 2013.		
169	No date	"Asbestos Disease, An Overview for Clinicians," by ATSDR (Agency for Toxic Substances and Disease Registry). No date		
170	1980	No Safe Level/ Low Doses Cause Mesothelioma NIOSH Publication No. 81-103, "Workplace Exposure to Asbestos, Review and Recommendations." NIOSH-OSHA Asbestos Work Group (April 1980)		

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
171	1998 "Pleural Mesothelioma: Dose-Response Relation at Low Levels of Asbestos Exposure in a French Population-based Case-Control Study", Y. Iwatsubo, American Journal of Epidemiology, Vol 148, No. 2, 1998			
172	1998 World Health Organization, International Programme on Chemical Safety (IPCS), "Environmental Health Criteria 203, Chrysotile Asbestos." (1998)			
173	1999 "Mesothelioma: Cases associated with non-occupational and low dose exposures", Hillerdal			
174	2000 "A Guide for Ship Scrappers: Tips for Regulatory Compliance." Prepared for the Environmental Protection Agency (Summer 2000)			
175	2000 "The Quantitative Risks of Mesothelioma and Lung Cancer in Relation to Asbestos Exposure," by J. Hodgson and A. Darnton. Published in <i>Ann. Occup. Hyg.</i> , Vol. 44, No. 8, pp. 565-601 (2000)			
176	2000 Letter: "Mesothelioma risk from chrysotile," by JT Hodgson, A. Darnton. <i>Occup Environ Med.</i> June 2010, Vol. 67, No. 6.			
177	9/18/2000 World Trade Organization - Report of the Panel, "European Communities - Measures Affecting Asbestos and Asbestos-Containing Products." Date: September 18, 2000			
178	2001 "Asbestos and Man-Made Vitreous Fibers as Risk Factors Diffuse Malignant Mesothelioma: Results from a German Hospital-Based Case-Control Study," Klaus Rodelsberger, Amer. Journal of Ind. Med. 39:262-275. Dated: 2001			
179	2001 "Toxicological Profile for Asbestos," U.S. Department of Health and Human Services, Agency for Toxic Substances and Disease Registry. Date: September 2001			
180	2004 "Chrysotile Asbestos as a Cause of Mesothelioma: Application of the Hill Causation Model," commentary by Richard Lemen, April/June 2004 Vol. 10/No.2			
181	2005 "Can Exposure to Very Low Levels of Asbestos Induce Pleural Mesothelioma?" by M. Goldberg and D. Luce. Published in <i>Am J Respir Crit Care Med.</i> Vol 172, pp. 939-940. (2005)			

PLAINTIFFS' EXHIBIT LIST

	Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
182		2005 "Residential Proximity to Naturally Occurring Asbestos and Mesothelioma Risk in California," by Xue-lei Pan, et al. Published in <i>Am J Respir Crit Care Med</i> , Vol 172, pp. 1019-1024 (2005)			
183		1/31/2006 Website article, "Asbestos - Prevention and Early Detection," American Cancer Society. Revised January 31, 2006.			
184		Sept. 2006 World Health Organization, "Elimination of asbestos-related diseases." September 2006.			
185		1998-2006 "Risk of Pleural Mesothelioma: A French Population-Based Case-Control Study". (1998-2006) Authors: P. Rolland, et al.			
186		2008 Dail and Hammar's Pulmonary Pathology, Vol. II, Neoplastic Lung Disease (3rd Ed.). Editors: Tomashefski, Cagle, Farver, Fraire. Copyright 2008.			
187		1/10/2008 Website article from The Asbestos Informer, Region 4, US EPA "Asbestos," Last updated: January 10, 2008. www.epa.gov/Region4/air/asbestos/inform.htm			
188		2009 "Mesothelioma Risk and Environmental Exposure to Asbestos," by Kenichi Azuma, et al. Published in <i>Int J Occup Environ Health</i> , Vol 15/No 2. Date: April/June 2009.			
189		4/1/2009 Internet announcement, "Statement from Acting Surgeon General Steven K. Galson about National Asbestos Week." Date: April 1, 2009.			
190		12/14/2011 EPA Report, "Early Warning Report: Use of Unapproved Asbestos Demolition Methods May Threaten Public Health." Report No. 12-P-0125. December 14, 2011.			
191		2013 "Asbestos," US Dept of Labor, OSHA website: https://www.osha.gov/SLTC/asbestos . (2013)			
192		10/24/2013 OSHA News Release, "OSHA releases new resources to better protect workers from hazardous chemicals," October 24, 2013.			
193		1933 Visible Dust is a Hazard "The Mechanical Control of Occupational Diseases," David Beyer. <i>National Safety News</i> , August 1933. (G 400)			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
194	1935 (Sep) "No Half Way Measures in Dust Control." Arthur Johnson. September 1935.			
195	6/1/1937 "Occupational Disease Hazards - Asbestosis," The Employers' Group - Engineering Manual, June 1, 1937.			
196	7/20/1938 "Industrial Medicine Symposium No. 3, 1938" <i>Medical Press and Circular Supplement</i> , July 20, 1938.			
197	1942 (Apr) "The Occupational Disease Hazard - Evaluation in the Field," Warren Cook. <i>Industrial Medicine</i> , Vol 3, Section 2. April 1942.			
198	1942 (Apr) "Hypertension in Workers over Forty Years of Age," A. Master and S. Dack. <i>Industrial Medicine</i> , Vol 11, Number 4. April 1942.			
199	1955 Excerpt from: <u>Plant and Process Ventilation</u> , W.C.L. Hemeon. (1955)			
200	2/5/1969 February 5, 1969 letter from George Archer (Pneumafil Corp) to Robert Goodell (JM). Subject: fiber collection.			
201	4/6/1976 April 6, 1976 letter from H.H. Frazier to J.F. Ballew. Subject: E.R. Industrial Hygiene.			
202	8/17/1994 August 17, 1994 Exxon Co. letter from James Hammond to Hans Siegel.			
	Diagnostic Criteria for Mesothelioma			
	1992 "Mesothelioma," Chapter 5 from <u>Pathology of Asbestos-Associated Diseases</u> , 1st Ed by Drs. Roggli, Greenberg, Pratt. Copyright 1992.			
	2003 "Sarcomatoid mesothelioma and its histological mimics: a comparative immunohistochemical study," Lucas, et al. <i>Histopathology</i> 2003. 42:270-279.			
	2004 "Mesothelioma," Chapter 5 from <u>Pathology of Asbestos-Associated Diseases</u> , 2nd Ed. Editors: Drs. Roggli, Oury, Sporn. Copyright 2004			
	2004 "Tumours of the Pleura," Chapter 2 from <u>WHO Classification of Tumours. Pathology & Genetics of Tumours of the Lung, Pleura, Thymus and Heart</u> . Edited by W. Travis, et al. Copyright 2004.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2006	"The Pathologic Features of Asbestos-Induced Disease," Chapter 5 from <u>Asbestos - Risk Assessment, Epidemiology, and Health Effects</u> . Editors: Drs. Dodson, Hammar. Copyright 2006.		
	2006	"My approach to the diagnosis of mesothelial lesions," KJ Butnor. <u>J Clin Pathol</u> 2006;59:564-574.		
	2008	Excerpt from Dail and Hammar's <u>Pulmonary Pathology</u> . VII, 3rd ed, pp. 652-657.		
	2009	"Guidelines for Pathologic Diagnosis of Malignant Mesothelioma," A. Husain, et al. <u>Arch Pathol Lab Med</u> , Vol. 133, pp.1317-1331 (August 2009).		
	2010	"Sarcomatoid Neoplasms of the Lung and Pleura," W.Travis. <u>Arch Pathol Lab Med</u> , Vol. 134, pp. 1645-1658 (November 2010)		
	2011	"Asbestos and Mesothelioma, Chapter 7 from <u>Asbestos - Risk Assessment, Epidemiology, and Health Effects</u> , 2nd Ed. Editors: Drs. Dodson, Hammar. Copyright 2011.		
	2012	"Diffuse Malignant Mesothelioma," S. Oviedo & P. Cagle. <u>Arch Pathol Lab Med</u> , Vol. 136, pp.882-888 (August 2012).		
		Chrysotile Articles		
	1965	"Occupational & Non-occupational Exposures to Asbestos", Annals of the New York Academy of Sciences, Hueper		
	1966	"Asbestos, an extrinsic factor in the pathogenesis of bronchogenic carcinoma and mesothelioma." O'Donnell, et al. <u>Cancer</u> 1966;19:1143-1148.		
	1966	"Mesothelioma associated with asbestosis: A report of 3 cases." Mann, et al. <u>Cancer</u> . 1966;19:521-526.		
	5/6/1969	Report dated May 6, 1969;Asbestos Floats; Source Phillip Carey 7RF-9 Floats; SGP 0015906. Supersedes Formula No. 9, dated 10/20/59. (<u>Also GP 1477</u>)		
	1971	"Two cases of malignant mesothelioma after exposure to asbestos." Champion. <u>Am Rev Respir Dis</u> . 1971;103:821-826.		

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	11/13/1982			
	"Mesothelioma in a Brake Repair Worker," by A.M. Langer. <i>The Lancet</i> , November 13, 1982.			
	1982			
	"Mortality of two groups of women who manufactured gas masks from chrysotile and crocidolite asbestos: a 40-year follow-up," by E.D. Acheson, et al. Published in <i>Brit. J. of Ind. Med.</i> 1982; 39:344-348.			
	1983			
	"Mesothelioma among machinists in railroad and other industries." Mancuso <i>Am J Ind Med.</i> 1983;4:501-513.			
	1985			
	"Occupational Risks for Pleural Mesothelioma in Sweden, 1961-79," by Walker, McLaughlin, et al. Published in JNCI, Vol. 74, No. 1, January 1985.			
	1987			
	"Malignant mesothelioma with occupational and environmental asbestos exposure in an Illinois community hospital." Wolf KM, et al. <i>Arch Intern Med.</i> 1987;147:2145-2149.			
	1988			
	"Relative Risk of Mesothelioma Among Railroad Machinists Exposed to Chrysotile," by Thomas Mancuso. 1988, Am.J.Ind.M. 13:639-657			
	1989			
	"Mesothelioma and Asbestos Fiber Type, Evidence From Lung Tissue Analyses," by J.C. McDonald, et al. Published in Cancer, April 15, 1989.			
	1990			
	"An update of cancer mortality among chrysotile asbestos miners in Balangero, northern Italy," by Giorgio Piolatto, et al. 1990, Brit.J.Ind.M. 47:810-814.			
	1990			
	"Retrospective mortality study of asbestos workers in Laiyuan." Shiqu, et al. In: Proceedings of the VII International Pneumonoconiosis Conference Part II, August 23-26, 1988, Pittsburgh, PA. National Institute for Occupational Safety and Health; 1990:1242-1244. DHHS publication 90-109, part II.			
	1991			
	"Chrysotile asbestos and health in Zimbabwe: I. Analysis of miners and millers compensated for asbestos-related diseases since independence." Cullen & Baloyl <i>Am J Ind Med.</i> 1991;19:161-169			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	4/1/1991 "Relationship Between Lung Asbestos Fiber Type and Concentration and Relative Risk of Mesothelioma" a Case Control Study by A.J. Rogers, et al. <i>Cancer</i> April 1, 1991			
1993	"Study of occupational lung cancer in asbestos factories in China." Huilan & Zhiming. <i>Br J Ind Med</i> . 1993;50:1039-1042.			
1994	"Asbestos- Related Disease Associated With Exposure to Asbestiform Tremolite", Srebro & Roggli, Am. Journal Ind. Med			
1994	"Lung Cancer mortality among asbestos textile workers: A review and update." Dement and Brown. <i>Ann Occup Hyg</i> . Vol. 38, No. 4, pp. 525-532 (1994)			
1994	"Follow-up study of chrysotile asbestos textile workers: cohort mortality and case-control analyses." Dement J, et al. <i>Am J Ind Med</i> . 1994;26:431-447.			
1994	"Use of asbestos, health risks and induced occupational diseases in the former East Germany," by W. Sturm, et al. 1994 Toxicology Letters 72: 317-324			
1995	"Fibers in Lung Tissues of Mesothelioma Cases Among Miners and Millers of the Township of Asbestos, Quebec," by A. Dufresne, et al. Published in American Journal of Industrial Medicine 27:581-592 (1995).			
1995	"Mortality among workers at a plastic manufacturing and research and development facility: 1946-1988." Dell & Teta <i>Am J Ind Med</i> . 1995;28:373-384.			
1995	"Occupational Exposure to Chrysotile Asbestos and Cancer Risk: A Review of the Amphibole Hypothesis," by Leslie Stayner, Richard Lemen, et al. 1995			
1996	Chapter 18 excerpt, "Occupation," by R. Monson from book entitled, <i>Cancer Epidemiology and Prevention</i> , 2nd Ed. by D. Schottenfeld and J. Fraumeni (1996).			
1996	"Chrysotile Asbestos is the Main Cause of Pleural Mesothelioma," by Allan Smith, et al, 1996, Am.J.Ind.Med. 30:252-266			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	1997	"Asbestos, asbestosis, and cancer: the Helsinki criteria for diagnosis and attribution," Consensus report, Scand J Work Environ Health 1997, 23:311-6		
	1997	"Mesothelioma in Quebec chrysotile miners and millers: Epidemiology and aetiology." McDonald, et al. Ann Occup Hyg. 1997;41:707-719.		
	1998	World Health Organization, International Programme on Chemical Safety (IPCS), "Environmental Health Criteria 203, Chrysotile Asbestos." (1998)		
	1998	"Asbestos in the lungs of persons exposed in the USA," by AM Langer. RP Nolan, 1998 Monaldi Arch 53:2, 168-180		
	5/28/98	"Asbestos-Still a Carcinogen," by Philip Landrigan, NEJM May 28, 1998		
	1998	"Carcinogenic Implications of the Lack of Tremolite in UICC Reference Chrysotile," by Arthur Frank, Dodson, et al. 1998 Am.J.Ind.M. 34:314-317		
	1999	"The Hazards of Chrysotile Asbestos: A Critical Review," by Philip Landrigan, et al Industrial Health 1999. 37:271-280		
	2000	"The Quantitative Risks of Mesothelioma and Lung Cancer in Relation to Asbestos Exposure," by J. Hodgson and A. Darnton. Published in Ann. Occup. Hyg., Vol. 44, No. 8, pp. 565-601 (2000)		
	9/18/2000	World Trade Organization - Report of the Panel, "European Communities - Measures Affecting Asbestos and Asbestos-Containing Products." Date: September 18, 2000		
	2001	"Asbestos Tissue Burden Study on Human Malignant Mesothelioma," by Y. Suzuki, et al- Industrial Health, 2001. 39:150-160.		
	2001	"Cancer Mortality among Workers Exposed to Amphibole-free Chrysotile Asbestos," by Eiji Yano, et al, 2001 Am.J.Epidemiol. Vol. 154, No. 6		
	2001	"Epidemiology of occupational asbestos-related diseases in China." Cai, et al. Industrial Health. 2001;39:75-83.		

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2001 "Retrospective View of Airborne Dust Levels in Workplace of a Chrysotile Mine in Ural, Russia," S. Kashansky, et al, <i>Industrial Health</i> 39, 51-56 (2001). [Russian paper]			
	2001 "The Health Effects of Mining and Milling Chrysotile: The Russian Experience," S. Shcherbakov, et al. <i>Can. Mineral., Spec. Publ.</i> 5, pp. 187-198 (2001). [Russian paper]			
	2001 "The Carcinogenicity of Chrysotile Asbestos-A Review," by William Nicholson, <i>Industrial Health</i> , 2001. 36:57-64			
	3/12/01 World Trade Org., "European Communities-Measures Affecting Asbestos and Asbestos-Containing Products," 3/12/01			
	2002 "Malignant Mesothelioma in Australia, 1945-2000," by James Leigh, et al, 2002 <i>Am.J.Ind.M.</i> 41:188-201			
	2002 "Risk of mesothelioma among women living near chrysotile mines versus USEPA asbestos risk model: Preliminary findings." Camus M, et al. <i>Ann Occup Hyg.</i> 2002;46(Suppl 1):95-98.			
	2002 "The North American Experience with Malignant Mesothelioma," A. Greenberg, et al. Published in Robinson & Chahinian's <i>Mesothelioma</i> , (2002). Chapter 1, pp. 1-27.			
	2003 "Asbestos Fiber Length as Related to Potential Pathogenicity: A Critical Review," by Ronald Dodson, et al, 2003 <i>Am.J.Ind.M.</i> 44:291-297			
	2003 "Exposing the 'Myth' of ABC, 'Anything But Chrysotile': A Critique of the Canadian Asbestos Mining Industry and McGill University Chrysotile Studies," by David Egilman, C. Fehnel, et al, 2003 <i>Am.J.Ind.M.</i> Vol. 44:540-557			
	2004 "Asbestos in Brakes: Exposure and Risk of Disease," by Richard Lemen, 2004 <i>Am.J.Ind.M.</i> , Vol. 45:229-237			
	2004 "Cancer mortality and morbidity among Lithuanian asbestos-cement producing workers." Smaliyte, et al. <i>Scand J Work Environ Health</i> 2004;30:64-70.			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2004	"Chrysotile Asbestos as a Cause of Mesothelioma: Application of the Hill Causation Model," commentary by Richard Lemen, April/June 2004 Vol. 10/No.2		
	2004	"Dr. T.K. Joshi and Asbestos in India: A Message from the Collegium Ramazzini," by Philip Landrigan, 2004 Am.J.Ind.M. Vol. 45:125-128		
	2004	"Mortality experience in an historical cohort of chrysotile asbestos textile workers." Mamo C, Costa, G. WS-E-03. Paper presented at the Global Asbestos Congress, Waseda University, Tokyo, Japan, November 19-21, 2004.		
	10/3/05	"Advances in Malignant Mesothelioma," by Bruce Robinson, R. Lake. 10/3/05 NEJM article Vol. 353:15		
	2006	Book: "Asbestos, Risk Assessment, Epidemiology, and Health Effects" by Ronald F. Dodson, S. Hammar, 2006		
	2006	Book: "Asbestos, Selected Cancers," Institute of Medicine of the National Academies. Copyright 2006		
	2006	"Measurements of Asbestos Burden in Tissues," by Ronald E. Dodson, et al. Published in <i>Ann. NY. Acad. Sci.</i> 1076: 281-291 (2006)		
	1/31/2006	Website article, "Asbestos - Prevention and Early Detection," American Cancer Society. Revised January 31, 2006.		
	Sept. 2006	World Health Organization, "Elimination of asbestos-related diseases." September 2006.		
	2007	"Occupational Asbestos Exposure Among Respiratory Cancer Patients in Lithuania," Everatt, et al, <i>Am J of Indust Med</i> , 50:455-463 (2007). [Russian paper]		
	2007	"Follow-up study of chrysotile textile workers: Cohort mortality and exposure-response." Hein MJ, et al. <i>Occup Environ Med</i> . 2007;64:616-625.		
	2007	NRDC comments on the "Short List" Candidates for the Asbestos Panel of the EPA Science Advisory Board (SAB). May 2007		

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2007			
	2007			
	2008			
	1/10/2008			
	12/6/2008			
	2008			
	6/4/2008			
	2009			

"Pleural mesothelioma in New Caledonia: An acute environmental concern." Baumann, et al. *Cancer Detect Prev.* 2007;31:70-76.

Robbins *Basic Pathology*, 8th Ed., by V. Kumar, et al. Copyright 2007 by Saunders Elsevier publishing. ISBN: 978-1-4160-2973-1

"A Technical Comparison of Evaluating Asbestos Concentration by Phase-Contrast Microscopy (PCM), Scanning Electron Microscopy (SEM), and Analytical Transmission Electron Microscopy (ATEM) as Illustrated from Data Generated From a Case Report," by R. Dodson, S. Hammar, and L. Poye. Published in *Inhalation Toxicology* 20:723-732 (2008)

Website article from The Asbestos Informer, Region 4, US EPA "Asbestos," Last updated: January 10, 2008.

www.epa.gov/Region4/air/asbestos/inform.htm

Editorial, "Asbestos-related disease—a preventable burden."

Published in *The Lancet*, Vol 372, p. 1927, December 6, 2008.

Dail and Hammar's *Pulmonary Pathology*, Vol. II, Neoplastic Lung Disease (3rd Ed.). Editors: Tomashefski, Cagle, Farver, Fraire. Copyright 2008.

"Excess of Mesotheliomas after Exposure to Chrysotile in Balangero, Italy," by Dario Mirabelli, et al. Published in *Occup. Environ. Med.* Date: June 4, 2008

Case Report: "Mesothelioma in a Worker Who Spun Chrysotile Asbestos at Home During Childhood," by Eiji Yano, et al. Published in *Am. J. of Ind. Med.*, (2009).

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2009 "Asbestos Fiber Burden Analysis of Lung and Lymph Nodes in 100 Cases of Mesothelioma," by R.E. Gordon, S. Dikman. <i>Am J. Respir Crit Care Med</i> 179: 2009; A5892.			
	2009 "Chrysotile Biopersistence, The Misuse of Biased Studies," by Henri Pezerat, Ph D. Published in <i>Int. J. of Occup. And Environ. Health</i> , Vol. 15, Number 1, pp. 102-106. Dated: January/March 2009.			
	2009 "Developments in Asbestos Cancer Risk Assessment," M. Silverstein, L. Welch, R. Lemen. <i>Am. J. Ind. Med</i> (2009).			
	2009 Email exchange between Dr. Aliya N. Husain (Prof. of Pathology, University of Chicago) and attorney Chris Panatier re: "Robbins 8th Ed. Textbook Question." Date: June-July 2009 [Authenticated by Affidavit of Christopher Panatier, dated 09/21/11]			
	2009 "Environmental exposure to asbestos and the exposure-response relationship with mesothelioma," by M.T. Madkour, et al. <i>Eastern Mediterranean Health Journal</i> , Vol. 15, No. 1 (2009)			
	2009 "Fiber Types, Asbestos Potency, and Environmental Causation, A Peer Review of Published Work and Legal and Regulatory Scientific Testimony," by David Egilman. Published in <i>Int J Environ Health</i> . Vol.15/No.2. Date: April/June 2009.			
	2009 "Lung cancer mortality and fibre exposures among North Carolina asbestos textile workers," D.Loomis, et al. <i>Occup & Environ Med</i> , Vol. 66(8). pp. 535-542 (August 2009)			
	2009 "Mortality from cancer and other causes in the Balangero cohort of chrysotile asbestos miners." Pira, et al. <i>Occup Environ Med</i> . 2009;66:805-809.			
	5/1/2009 National Cancer Institute (NCI) FactSheet, "Asbestos Exposure and Cancer Risk." Date: May 1, 2009.			
	2009 "Asbestos CAS No. 1332-21-4, Known to be a human carcinogen." First listed in the <i>First Annual Report on Carcinogens, Eleventh Edition</i> . (2009)			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2009			
	4/1/2009			
	2010			
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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2010 (Jul)			
	"The Case for a Global Ban on Asbestos," by J. LaDou, Castleman, et al. <i>Environ Health Perspectives</i> , Vol. 118, No. 7. Date: July 2010.			
	2011			
	"Applying Quality Criteria to Exposure in Asbestos Epidemiology Increases the Estimated Risk," Burdorf and Heederik. <i>Ann. Occup. Hyg.</i> , Vol. 55, No. 6, pp. 565-598 (2011).			
	2011			
	"Current Intelligence Bulletin 62, Asbestos Fibers and Other Elongate Mineral Particles: State of the Science and Roadmap for Research, Revised Edition." Dept of Health & Human Services, April 2011.			
	2011			
	"Mesothelioma from Chrysotile Asbestos: Update," Kanarek. <i>Ann Epidemiol</i> (2011);21:688-697.			
	2011			
	"Pleural mesothelioma in New Caledonia: Associations with environmental risk factors." Baumann, et al. <i>Environ Health Perspect.</i> 2011;119:695-700			
	3/17/2011			
	Powerpoint presentation, "Update of the scientific evidence on asbestos and cancer," by Dr. Kurt Straif of the International Agency for Research on Cancer (IARC) - Lyon, France. World Health Organisation. March 17, 2011			
	6/10/2011			
	Report on Carcinogens, Twelfth Edition (2011).			
	6/4/2012			
	Joint Policy Committee of the Societies of Epidemiology (JPC-SE), "Position Statement on Asbestos," June 4, 2012.			
	9/4/2012			
	"Union for the International Control of Cancer adopts Position Statement on Asbestos," by Kathleen Ruff (founder of RightOnCanada.ca) September 4, 2012			
	2012			
	Editorial, "A call to action: epidemiologists assert themselves with scientific data," by Stanley Weiss. Published in <i>Int'l J of Occup and Environ Health</i> . Vol 18, No. 3. July-Sept 2012			
	2012			
	Editorial, "China and the US: asbestos in common," by Arthur Frank. Published in <i>Int'l J of Occup and Environ Health</i> , Vol 18, No. 3. July-Sept 2012			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2012			
	Freeman & Kohles, "Assessing specific causation of mesothelioma following exposure to chrysotile asbestos containing brake dust," <i>Int'l J of Environ & Occup Health</i> , Vol. 18, No. 4, pp. 329-336.			
	2012			
	IARC Monographs, "Arsenic, Metals, Fibres, and Dusts - Volume 100 C - A review of human carcinogens." (2012)			
	1/18/2013			
	"The Worldwide Pandemic of Asbestos-Related Diseases," Stayner, Welch, Lemen. <i>Annu. Rev. Public Health</i> 2013, 34:4.1-4.12. January 18, 2013.			
	5/20/2013			
	"Mesothelioma and Employment in Massachusetts: Analysis of Cancer Registry Data 1988-2003," C. Roelofs, et al. <i>Am J of Indust Med.</i> pp.1-8, May 20, 2013.			
	2013 (Jun)			
	"Pulmonary disease asbestos mill workers," R. Zurbriggen & L. Capone. <i>Medicina (B. Aires)</i> , Vol. 73, No. 3. Printed from www.scielo.org.			
	10/13/2014			
	"Asbestos, asbestosis, and cancer: the Helsinki criteria for diagnosis and attribution," Consensus report, Scand J Work Environ Health - 2014.			
	No date			
	U.S. Standard Sieve chart, no date.			
	No date			
	U.S. Department of the Interior U.S. Geological Survey, "Asbestos: Geology, Mineralogy, Mining, and Uses," by Robert L. Virta. Open-File Report 02-149. No date.			
	NEWSPAPER ARTICLES			
	10/15/1932			
	Stevens Point Daily Journal (WI)			
	12/19/1933			
	The Modesto Bee (CA)			
	12/22/1933			
	The Lowell Sun (MA)			
	1/2/1934			
	The Brownsville Herald (TX)			
	1934			
	The Industrial Bulletin (NY)			
	1/25/1936			
	Chester Times (PA)			
	1/28/1936			
	The Kokomo Tribune			
	2/19/1936			
	The Evening Tribune (MN)			
	2/19/1936			
	The Oshkosh Northwestern (WI)			
	2/19/1936			
	Jefferson City Post-Tribune (MO)			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2/19/1936 The Abilene Daily Reporter (TX)			
	2/20/1936 Salamanca Republican-Press (NY)			
	2/22/1936 The Titusville Herald (PA)			
	2/28/1936 Oakland Tribune (CA)			
	11/27/1936 Tyrone Daily Herald (PA)			
	10/22/1937 The Brownsville Herald (TX)			
	10/23/1937 Ironwood Daily Globe (MI)			
	10/25/1937 El Paso Herald Post (TX)			
	4/29/1943 The Brainerd Daily Dispatch (MN)			
	3/9/1944 The Fresno Bee (CA)			
	7/1/1946 The Bridgeport Telegram (CT)			
	8/17/1946 The Modesto Bee (CA)			
	1/7/1948 The New York Times (NY)			
	11/23/1949 The Ruthven Free Press (IA)			
	7/20/1950 Warren Times Mirror (PA)			
	7/21/1950 Council Bluffs Nonpareil (IA)			
	7/22/1950 Council Bluffs Nonpareil (IA)			
	7/27/1950 Jefferson City Post-Tribune (MI)			
	8/1/1950 Panama City News-Herald (FL)			
	8/14/1950 The Bee (VA)			
	9/1/1950 Fitchburg Sentinel (MA)			
	9/12/1950 The Maryville Daily Forum (MI)			
	12/20/1951 Chester Times (PA)			
	12/27/1952 Walla Walla Union-Bulletin (WA)			
	8/27/1953 The Monessen Daily Independent (PA)			
	10/22/1953 Fitchburg Sentinel (MA)			
	3/15/1954 The New York Times (NY)			
	4/27/1955 The Monessen Daily Independent (PA)			
	2/22/1956 Stevens Point Daily Journal (WI)			
	5/16/1957 The Daily Leader (PA)			
	4/23/1960 The North Adams Transcript (MA)			
	11/14/1961 Press Telegram (CA)			
	1/11/1962 The Daily Leader (PA)			
	10/23/1962 The Post-Standard (NY)			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	3/29/1964 The Bridgeport Telegram (CT)			
	10/6/1964 Indiana Evening Gazette (PA)			
	10/6/1964 The Waco Times-Herald (TX)			
	1/12/1965 The Plain Dealer (OH)			
	2/24/1965 Independent (CA)			
	2/24/1965 Press Telegram (CA)			
	1/28/1966 The Gettysburg Times (PA)			
	3/2/1966 Press Telegram (CA)			
	3/2/1966 The New York Times article, "Asbestos Dust Called Hazard To at Least One-Fourth of U.S." Date: March 2, 1966.			
	3/2/1966 Utica Observer-Dispatch (NY)			
	5/31/1966 St. Louis Post-Dispatch (MO)			
	10/11/1968 The Times Record (NY)			
	1/2/1969 The Times Recorder (OH)			
	1/10/1969 The Sheboygan Press (WI)			
	1/10/1969 Ironwood Daily Glove (MI)			
	1/10/1969 The Times Recorder (OH)			
	1/10/1969 Iowa City Press-Citizen (IA)			
	1/10/1969 Abilene Reporter-News (TX)			
	1/10/1969 The Odessa American (TX)			
	1/14/1969 The Bridgeport Telegram (CT)			
	1/16/1969 The Brownsville Herald (TX)			
	3/30/1969 Chicago Tribune (IL)			
	4/3/1969 Danville Register (VA)			
	4/10/1969 Fond du Lac Commonwealth Reporter (WI)			
	5/2/1969 Southern Illinoisan (IL)			
	5/27/1970 Dallas Morning News			
	5/27/1970 The Bridgeport Telegram (CT)			
	5/31/1970 The Bridgeport Post (CT)			
	6/16/1970 The Bridgeport Telegram (CT)			
	6/17/1970 Dallas Morning News			
	9/15/1970 Chicago Tribune (IL)			
	1/21/1971 The Post-Standard (NY)			
	1/21/1971 Chicago Tribune (IL)			

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	5/21/1971 Chicago Tribune (IL)			
	6/29/1971 The Bridgeport Telegram (CT)			
	8/6/1971 Dallas Morning News			
	7/22/1971 Ames Daily Tribune (IA)			
	9/26/1971 Danville Register (VA)			
	9/26/1971 News Herald (FL)			
	9/26/1971 Tri-City Herald (WA)			
	10/22/1971 Tri-City Herald (WA)			
	11/5/1971 The Bridgeport Post (CT)			
	11/6/1971 The Bridgeport Telegram (CT)			
	11/9/1971 The Bridgeport Post (CT)			
	12/2/1971 Chicago Tribune (IL)			
	12/8/1971 Chicago Tribune (IL)			
	6/11/1972 The Modesto Bee (CA)			
	6/15/1972 Tri-City Herald (WA)			
	6/22/1972 Edwardsville Intelligencer (IL)			
	9/29/1972 Press Telegram (CA)			
	9/30/1972 The New York Times (NY)			
	9/30/1972 Star-News (CA)			
	10/5/1972 The Bridgeport Telegram (CT)			
	10/5/1972 The New York Times (NY)			
	7/11/1973 The Sheboygan Press (WI)			
	4/29/1977 Dallas Morning News			
	Corruption of the Literature Articles			
	1958 Exemplar book, "Monographs on Neoplastic Disease, Vol. 1, Carcinoma of the Lung." Editors D.W. Smithers & J.R. Bignall. Copyright 1958.			
	2002 Book, "African Issues, Asbestos Blue, Labour, Capital, Physicians & the State in South Africa." by McCulloch (2002)			
	2003 "Exposing the 'Myth' of ABC, 'Anything But Chrysotile': A Critique of the Canadian Asbestos Mining Industry and McGill University Chrysotile Studies," by David Egilman, C. Fehnel, et al, 2003 Am. J. Ind. M. Vol. 44:540-557			

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Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	Jun-05	"Doubt Is Their Product," by David Michaels, published in <i>Scientific American</i> .		
	Oct/Dec 2005	"Abuse of Epidemiology: Automobile Manufacturers Manufacture a Defense to Asbestos Liability," by David Egilman, et al, published in <i>Int. J. Occup. Environ. Health</i> 2005, Vol. 11/ No. 4.		
	2006	"How to distort the scientific record without actually lying: truth, and the arts of science," by John C. Bailar, published in <i>Eur. J. Oncol.</i> , Vol. 11/ No. 4		
	7/1/2007	"How Litigation Shapes the Scientific Literature: Asbestos and Disease Among Automobile Mechanics." - David Michaels - Journal of Law and Policy.		
	Jan/Mar 2007	"Against Anti-health Epidemiology: Corporate Obstruction of Public Health via Manipulation of Epidemiology," by David Egilman, et al, published in <i>Int. J. Occup. Environ. Health</i> 2007, Vol. 13/ No. 1		
	Jul/Sept 2007	"Asbestos Exposure Causes Mesothelioma, But Not This Asbestos Exposure: An Amicus Brief to the Michigan Supreme Court," by Laura S. Welch, MD, published in <i>Int. J. Occup. Environ. Health</i> 2007, Vol. 13/ No. 3		
	7/1/2007	"How Litigation Shapes the Scientific Literature: Asbestos and Disease Among Automobile Mechanics," by Dr. David Michaels. July 1, 2007		
	2008	Book, "Doubt is Their Product, How Industry's Assault on Science Threatens Your Health," by David Michaels. Copyright 2008 by Oxford Univ. Press.		
	2008	Book, "Defending the Indefensible, The Global Asbestos Industry and its Fight for Survival," by McCulloch & Tweedale. (2008)		
	2008	Book, "Bending Science, How Special Interests Corrupt Public Health Research," by McGarity & Wagner. (2008)		

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2009			
	12/11/2010			
	12/16/2010			
	2012 (Feb)			
	4/30/2012			
	2012 (May)			
	2012			
	8/27/2013			
	2013 (Dec)			
	2013			
	2015			

"Chrysotile Biopersistence, The Misuse of Biased Studies," by Henri Pezerat, Ph D. Published in *Int. J. of Occup. And Environ. Health*, Vol. 15, Number 1, pp. 102-106. Dated: January/March 2009.

"Canada accused of hypocrisy over asbestos exports," by Tony Kirby. *The Lancet*, Vol. 376, Issue 9757, pp. 1973-1974. Date: December 11, 2010.

"Asbestos scandal, Irresponsible policies could cause an epidemic of malignant lung disease." Published in *Nature*, Vol. 468, p. 868. Date: December 16, 2010

"Heads They Win, Tails We Lose, How Corporations Corrupt Science at the Public's Expense," by The Scientific Integrity Program of the Union of Concerned Scientists. February 2012.

"Pro asbestos advocacy group shuts its doors," by Robert Hiltz, POSTMEDIA NEWS, April 30, 2012. *Printed from canada.com*

RighOn Canada - "International Call for Action to Stop Intimidation of Scientists by the Asbestos Industry." By Dr. Elia Abi-Jaoude, et al. <http://www.righoncanada.ca/?p=1430> (May 2012).

Editorial, "A call to action: epidemiologists assert themselves with scientific data," by Stanley Weiss. Published in *Int'l J of Occup and Environ Health*, Vol 18, No. 3, July-Sept 2012

"Transparency and translation of science in a modern world," Philippe Grandjean & David Ozonoff. *Environmental Health* 2013, 12:70. [Provisional PDF, Complete Not Yet Published]

Lab rats: The anatomy of deadly product defense campaigns - Hazards magazine. www.hazards.org/deadlybusiness/labrats. December 20, 2013.

"Protecting Our Science," Noah Seixas. *Ann Occup Hyg*, Vol. 57, No. 8, pp. 963-965 (2013).

"How Conflicted Authors Undermine the World Health Organization Campaign to Stop all Uses of Asbestos." - Baur, et al., - *International Journal of Occupational and Environmental Health*, Vol. 21, No.2, 2015.

[illegible]

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	Friction Literature			
1932	Memorandum on the Industrial Diseases of Silicosis and Asbestosis			
1935	Memorandum on the Industrial Diseases of Silicosis and Asbestosis (WK FSOA 5102)			
1936	Exemplar book, "Brakes, Compiled and Published by Chilton Company (Philadelphia, PA). Copyright 1936.			
4/1940	Foundation Facts, Vol. 2, No. 4; April '40 (IHF 21)			
4/1941	Industrial Hygiene Digest, April 1941. (IHF 142)			
1944	1944 New York Worker's Compensation Asbestos Decision. "Reports of Selected Cases Decided in Courts of The State of New York." Vol. 181.			
1948	Article entitled, "Recognition and Control of Fume and Dust Exposure," by V. J. Castrop, published in National Safety News, February, 1948. (GM 4)			
1951	Exemplar 1951 "Accident Prevention Manual for Industrial Operations, Second Edition". Copyright National Safety Council, Inc.			
1959 (Jan)	"What's New in Brake Linings," by Newell H. McCuen. For presentation at the Society of Automotive Engineers (SAE) Annual Meeting, January 12-16, 1959.			
1965	"Occupational & Non-occupational Exposures to Asbestos", Annals of the New York Academy of Sciences, Hueper			
2/14/1968	Letter and report from Jeremiah R. Lynch to Ralph C. Wyatt. Subject: Results of air samples from September 1966, Maremont Grizzly Corp. From 2005 deposition of Carl Liggett, exhibit 21. Date: February 14, 1968.			
1970	The Asbestosis Research Council (ARC) "Asbestos Based Friction Materials and Asbestos Reinforced Resinous Moulded Materials," Control and Safety Guide-No. 8. Date: December 1970.			
1970	British Occupational Hygiene Society - Annals of Occupational Hygiene, Vol. 13 (1970) - Papers Presented at Conference March 26, 1969 at Offices of Ford.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	1970			
	1970			
	Circa 1970s			
	1972			
	1972			
	1/12/1973			
	1/26/1973			

"Epidemiology of Primary Malignant Mesothelial Tumors in Canada," by A.D. McDonald, et al. Published in *CANCER*, Volume 26 Issue 4, Pages 914 - 919. Date: October 1970.

Memo from J.S. Ninomiya (Ford Automotive Emissions Office) to H. L. Misch. Subject: Asbestos Emissions from Brake Lining Wear. Date: November 16, 1970. (FD 2a)

"Asbestos Exposure -vs- Back-Shop Brake Shoe Grinding," Prepared for: J.H. Batogowski (Sears Roebuck and Company, Chicago, IL). Prepared by: W.N. Bockay (Manager, Technical Services, Maremont Brake Products). Date: Circa 1970s. Bates# MAR 001279-001286. [Exhibit #18 to Carl Liggett depo taken 08/02/05 in *In Re: New York City Asbestos Litigation (Breidenstein)*, No. 2004-11581, in the Supreme Court, New York County, New York.] ALSO EXHIBITS: GRZ 5012 and SD 5010

Letter from E.W. Drislane (Friction Materials Standards Institute-FMSI) to J.H. Kelly (Bendix Corporation). Re: "Discussion concerning labeling requirements where brake linings are being shipped to customers." Date: November 28, 1972.

Borg Warner Inter-Office correspondence to R.L. Kristufek from J.D. Dresser. Subject: Asbestos Program. Attachment: "Asbestos Fiber Study for Borg and Beck Division Borg-Warner Corporation, Chicago, Illinois" by the National Loss Control Service Corporation. Date: November 28, 1972. (BW 5067)

January 12, 1973 Abex letter to C.E. Hub from V.E. Pilkington. Re: grievances to lining departments. (Also ABEX 5074)

Friction Materials Standards Institute, Inc., Bulletin No. 469, dated January 26, 1973 from E. W. Drislane to Active Members, sub: Additional Background on Asbestos. (BX 333)

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
1973	Ford memos indicating brake dust exposures [Paul Toth to J.A. Keller (May 16, 1973) Subject: Asbestos Exposure - Test Track, Kingman, Arizona] and [S.M. Luke to R.M. Quarles (May 24, 1972) Subject: Hazardous Materials].			
3/21/1973	Mead letter from E.K. Bancroft to James Niblick (Borg-Warner GM). Subject: OSHA requirements for the handling of asbestos fibers...producing friction paper. Date: March 21, 1973. Bates# MW/Beauchamp 001025-28.			
1974	Memo from I.H. Weaver to E.H. Penner (Technical Relations, Environmental Affairs Dept.-Johns-Manville Corp) attaching "revised draft of the Asbestos Friction Materials Work Practices." Date: October 24, 1974.			
1975	Exemplar magazine, Popular Mechanics, December 1975 article "Don't blow your gasket!" by Paul Weissler			
5/19/1975	May 19, 1975 Abex letter to C.E. Hubbard from V.E. Pilkington. Re: written lining vendors cautioning regarding lining dust. (Also Abex 5075)			
8/8/1975	Current Intelligence Bulletin 5, Asbestos. "Asbestos Exposure During Servicing of Motor Vehicle Brake and Clutch Assemblies." August 8, 1975. [NIOSH]			
1976	"Asbestos Exposure of Brake Repair Workers in the United States," by William V. Lorimer and Irving Selikoff, et al. <i>The Mount Sinai Journal of Medicine</i> , Vol. 43, No. 3 May-June 1976.			
1976	"Asbestos Exposure during Brake Lining Maintenance and Repair," by Arthur Rohl, et al. <i>Environmental Research</i> (1976)			
1976	Exemplar, "Auto Repair for Dummies," by Deanna Sclar. Copyright 1976			
3/30/1977	Bell Laboratories memo from G.D. Kenney. Subject: Asbestos Exposures During Brake Changes. Case: 48106-3. Date: March 30, 1977.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	10/26/1977 October 26, 1977 Rockwell International letter to Dennis Conlon (Abex Corp) from J.R. Butler. Re: received truck load of linings from your Salisbury plant with broken pallets containing excessive asbestos dust. (Also Abex 5076)			
	5/20/1978 "Non-Occupational Exposure to Asbestos and Malignant Mesothelioma in Females," by Nicholas Vianna, et al. <i>The Lancet</i> , May 20, 1978.			
	1/29/1979 Johnson & Zumwalde, Industrial Hygiene Assessment of Seven Brake Servicing Facilities. Date: January 29, 1979.			
	11/11/1980 GM Research Publication: "Characterization of Asbestos Emissions From Brakes," Authors: Muhlhair, Williams (November 1980)			
	4/27/1981 Industrial Hygiene Report Asbestos, Assessment "of Asbestos Exposure to Mechanics Performing Brake Service Operations." Report Written by: Dennis Roberts, Ralph Zumwalde. Date: April 27, 1981. Report # 32.4			
	9/28/1981 Steven S. Paskal final report on the Culver City Maintenance facility re. employee exposure to airborne asbestos dust during bus brake relining operations. Date: September 28, 1981			
	1981 "Extrapolation from Occupational Studies: A Substitute for Environmental Epidemiology," by Philip Enterline. <i>Environmental Health Perspectives</i> , December 1981.			
	1981 Ford Manufacturing Guideline, "Recommended Work Practices for Handling Asbestos." Number G3-19. Date: September 1981.			
	1981 "Reader's Digest Complete Car Care Manual," ISBN# 0-89577-088-1. Copyright 1981.			
	11/13/1982 "Mesothelioma in a Brake Repair Worker," by A.M. Langer. <i>The Lancet</i> , November 13, 1982.			
	11/22/1982 "Industrial Hygiene Summary Report of Asbestos Exposure Assessment for Brake Brake Mechanics," by Dennis R. Roberts, Ralph D. Zumwalde. Report #32.4. Date: November 22, 1982.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	1982 Report "Investigation of Health Hazards in Brake Lining Repair and Maintenance Workers Occupationally Exposed to Asbestos", by William J. Nicholson, Ph.D., et al, prepared for National Inst. for Occupational Safety and Health, Cincinnati, OH., 1982.			
	5/16/1983 May 16, 1983 Rockwell International letter to Virginia Smith (Abex Corp) from Jerry Rush. Re: Your shipments of asbestos brake linings to the Kenton plant...excessive dust in bottom of shipping containers. (Also Abex 5077)			
	6/1/1983 June 1, 1983 Rockwell International letter to George Payer (Abex Corp) from Mike Riordon. Re: Jerry Rush's May 16th letter [ABEX 5077] to Virginia concerning excessive dust in the lining boxes. (Also Abex 5078)			
	1984 Report "Investigation of Health Hazards in Brake Lining Repair and Maintenance Workers Occupationally Exposed to Asbestos", by William J. Nicholson, Ph.D., et al, prepared for National Inst. for Occupational Safety and Health, Cincinnati, OH., 1984. NIOSH Contract 210-77-0119			
	1984 Statement of William J. Nicholson, May 24, 1984. "Quantitative Risk Assessment for Asbestos Related Cancer."			
	1984 Statement of Arthur M. Langer, Ph.D., July 3, 1984 to OSHA.			
	1984 Motor Vehicle Manufacturers Association letter from Fred Bowditch (VP) to John Martonik (OSHA). Re. MVMA comments on proposed OSHA standard for asbestos in the 4/10/84 Federal Register. Date: May 24, 1984			
	9/30/1985 "Asbestos Dust Control in Brake Maintenance," by PEI Associates, Inc. Contract No. 68-02-3976. Prepared for EPA. Date: September 30, 1985.			
	Jun. 1986 EPA Gold Book, "Guidance for Preventing Asbestos Disease Among Auto Mechanics", EPA 560 OPTS 86 002. Date: June 1986			
	1986 (Sept) Video: "Don't Blow It!" Presented by the U.S. EPA and ALA of Maryland. Produced September 1986. (also FD 6039)			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	1987			
	"Exposure to Asbestos During Brake Maintenance of Automotive Vehicles by Different Methods," by Timo Kauppinen, et al. <i>Arm. Ind. Hyg. Assoc. J.</i> (1987).			
	1989			
	"Mortality of auto mechanics, a ten-year follow-up," by Eva Hansen. <i>Scand J. Work Environ. Health.</i> (1989)			
	1989			
	Dr. William Nicholson, table "Significant Risk Found for Low Asbestos Exposure."			
	1990			
	OSHA "The Proposed Standard for the Automotive Brake and Clutch Service Industry," <i>Federal Register</i> , Vol. 55, No. 140, July 20, 1990.			
	1990			
	SAE Technical Paper Series, "A Comparison of Braking Performance of Asbestos, Non-Asbestos, and Semi-Metallic Friction Material," by M. Kluger. Copyright 1990.			
	8/10/1990			
	Material Safety Data Sheet (MSDS) GM Delco Moraine Division, Dayton, OH, for Inland 4050 Brake Lining, 08/10/1990, with authentication. (GM 5060)			
	10/3/1991			
	MSDS Sheet "Chrysler Corp Service and Parts Operations -- Mopar Asbestos Brake, Generic Sheet -- 2530-00-437-0243." Date: October 3, 1991. (CHR 5110)			
	1994			
	"Malignant mesothelioma: attributable risk of asbestos exposure," by Spirtas, et al. <i>Occup. and Environ. Med.</i> 1994.			
	1995			
	"Recent Data on Cancer Due to Asbestos In Germany," by J.A. Roslery, et al. <i>Med Lav</i> 1995; 86,5:440-448.			
	5/24/1996			
	Preliminary MVA Report of Results: MVA1810, "Friction Product Fiber Release Studies." (Ford) James R. Millette. Date: May 24, 1996.			
	1/29/1997			
	MVA Report of Results: MVA1810, "Friction Product Fiber Release Studies," (Ford) James R. Millette. Date: January 29, 1997.			
	1997			
	Teschke et al, "Mesothelioma Surveillance to Locate Sources of Exposure to Asbestos", <i>Canadian Journal of Public Health</i> , p. 163 (1997).			
	1997			
	DATA: MAS Work Practice Study, "Carlisle Brakes Hand Filing," by Richard Hatfield, William Longo. Date: 1997			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	1997 VIDEO: MAS Work Practice Study, "Carlisle Brakes Hand Filing," by Richard Hatfield, William Longo. Date: 1997			
	1997 DATA: MAS Work Practice Study, "Carlisle Brake Shoe and Fel-Pro Gasket Clean-up," by Richard Hatfield, William Longo. Date: 1997			
	1997 VIDEO: MAS Work Practice Study, "Carlisle Brake Shoe and Fel-Pro Gasket Clean-up," by Richard Hatfield, William Longo. Date: 1997			
	1997 DATA: MAS Work Practice Study, "Bendix Brakes For Ford Vehicles," by Richard Hatfield, William Longo. Date: 1997			
	1997 VIDEO: MAS Work Practice Study, "Bendix Brakes For Ford Vehicles," by Richard Hatfield, William Longo. Date: 1997			
	1998 DATA: MAS Work Practice Study, "Bendix Brakes for Chrysler Vehicles," by Richard Hatfield, William Longo. Date: 1998			
	1998 VIDEO: MAS Work Practice Study, "Bendix Brakes for Chrysler Vehicles," by Richard Hatfield, William Longo. Date: 1998			
	Feb-98 Minnesota Pollution Control Agency, "Facts about Controlling Brake Dust to Protect Your Health...what every mechanic should know." February 1998.			
	1998 Ford MSDS Sheet: Ford Motor Company, Brake Shoe Set, Hazardous Materials Information System. Date: July 1998. (FD 6020)			
	2/25/1999 February 25, 1999 letter to Dr. Joel Seckar from Renee Kalmes, CIH (Exponent). Subject: Review of EPA's Proposed Phosphine Rule. Exponent Proposal 8601265.P01			
	2000 DATA: MAS Work Practice Study, "Arc Grinding of Brake Shoes," by Richard Hatfield, William Longo. Date: May 2000			
	2000 VIDEO: MAS Work Practice Study, "Arc Grinding of Brake Shoes," by Richard Hatfield, William Longo. Date: May 2000			
	2000 DATA: MAS Work Practice Study, "Arc Grinding of Brake Shoes II," by Richard Hatfield, William Longo. Date: August 2000			
	2000 VIDEO: MAS Work Practice Study, "Arc Grinding of Brake Shoes II," by Richard Hatfield, William Longo. Date: August 2000			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	World Trade Organization, "European Communities- Measures Affecting Asbestos and Asbestos-Containing Products," Report of the Panel. (September 18, 2000)			
9/18/2000	"Characterization of Vehicular Brake Service Personnel Exposure to Airborne Asbestos and Particulate," Published in <i>Applied Occupational and Environmental Hygiene</i> . Authors: Weir, Tolar, Meraz (2001)			
2001	DATA: MAS Work Practice Study, "Hand Sanding of Brake Shoes," by Richard Hatfield, William Longo. Date: March 2001 (<i>Bendix Volkswagen brake shoes</i>)			
Mar-01	VIDEO: MAS Work Practice Study, "Hand Sanding of Brake Shoes," by Richard Hatfield, William Longo. Date: March 2001 (<i>Bendix Volkswagen brake shoes</i>)			
Mar-01	UK ban of products containing chrysotile. "Asbestos in Motor Vehicle Repair," March 2001			
Mar-01	World Trade Organization, "European Communities- Measures Affecting Asbestos and Asbestos-Containing Products," Report of the Appellate Body (March 12, 2001)			
3/12/2001	Dept. of Labor and Industries pamphlet, "Working Safely with Asbestos in Clutch and Brake Linings," July 2001.			
Jul-01	"Malignant Mesothelioma in Australia, 1945-2000," by James Leigh. <i>Am. J. of Ind. Med.</i> 41:188-201 (2002).			
2002	MAS Study "Opening Brake Shoe Boxes Asbestos Air & Fabric Analysis Results," Date: October 18, 2003			
2003	Letter to Information Quality Guidelines Staff from Dr. James Leigh (The University of Sydney). Re: 1986 EPA Gold Book, "Guidance for preventing asbestos related disease among auto mechanics. October 1, 2003.			
10/1/2003	DATA: MAS Work Practice Study, "Compressed Air Blow Out of Asbestos Containing Brake Dust," by Richard Hatfield, William Longo. Date: August 15, 2004			
8/15/2004	VIDEO: MAS Work Practice Study, "Compressed Air Blow Out of Asbestos Containing Brake Dust," by Richard Hatfield, William Longo. Date: August 15, 2004			
8/15/2004				

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2004	"Asbestos in Brakes: Exposure and Risk of Disease," by Richard A. Lemen, MD; <i>Am. J. of Ind. Med.</i> (2004)		
	2004	Abstract: "Evaluation of the size and type of free particulates collected from unused asbestos-containing brake components as related to potential for respirability," by MA Atkinson, et al. <i>Am. J. Ind. Med.</i> (2004).		
	1/2/2004	S/P2 Chrysler announcement: "DaimlerChrysler Approves CCAR's S/P2 Training for College Automotive Program (CAP)," Date: January 2, 2004.		
	May-04	Workplace Health and Safety Bulletin, "Control of Asbestos During Brake Maintenance and Repair." <i>Revised May 2004</i>		
	2/8/2005	S/P2 Ford endorsement: "Ford Motor Company Advocates CCAR's 'S/P2' Training to Ford and Lincoln-Mercury Dealers," Date: February 8, 2005.		
	10/20/2005	OSHA letter from Daniel T. Crane re. "proposed Asbestos-Automotive Brake and Clutch Repair Work SHIB." Date: October 20, 2005.		
	2006	EPA Gold Pamphlet draft "Current Best Practices for Preventing Asbestos Among Brake and Clutch Repair Workers." Date: August 2006.		
	6/19/2006	S/P2 online course: "Mechanical Pollution Prevention Asbestos," June 19, 2006.		
	7/26/2006	OSHA bulletin, "Asbestos-Automotive Brake and Clutch Repair Work"		
	2006 (Aug)	DATA: MAS Study, "Hand Sanding & Grinding of Tractor Brakes: A Work Practice Study," by Longo, Mount, Hatfield. Date: August 2006.		
	2006 (Aug)	VIDEO: MAS Study, "Hand Sanding & Grinding of Tractor Brakes: A Work Practice Study," by Longo, Mount, Hatfield. Date: August 2006.		
	Mar. 2007	EPA pamphlet re. "Current Best Practices for Preventing Asbestos Exposure Among Brake and Clutch Repair Workers."		

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	Mar. 2008			
	Government Accountability Office, "Report to Congressional Requesters: Health and Safety Information." March 2008. GAO-08-265.			
	2007			
	"Asbestos Exposure Causes Mesothelioma, But Not This Asbestos Exposure: An Amicus Brief to the Michigan Supreme Court," by Laura S. Welch, MD; <i>Int. J. Occup. Environ. Health</i> , Vol. 13/ No. 3, July/September 2007			
	2008			
	Madl, et al., "Exposure to Chrysotile Asbestos Associated with Unpacking and Repacking Boxes of Automobile Brake Pads and Shoes." <i>Ann. Occ. Hyg.</i> Vol. 52 No. 6, pp. 463-479. (2008).			
	2008			
	Steven S. Paskal January 12, 2008 letter to JOEH commenting on article "Asbestos exposures of mechanics performing clutch service on motor vehicles," by Cohen HJ, Van Orden DR.			
	2008			
	"A Technical Comparison of Evaluating Asbestos Concentration by Phase-Contrast Microscopy (PCM), Scanning Electron Microscopy (SEM), and Analytical Transmission Electron Microscopy (ATEM) as Illustrated from Data Generated From a Case Report," by R. Dodson, S. Hammar, and L. Poye. Published in <i>Inhalation Toxicology</i> 20:723-732 (2008)			
	2/19/2008			
	MVA Report of Results: MVA 7380. "Analysis of General Motors Brakes for Asbestos," by Dr. James Millette. Date: February 19, 2008. (aka GM 5169)			
	2/19/2008			
	MVA Report of Results: MVA 7380. "Analysis of Ford Brake for Asbestos," by Dr. James Millette. Date: February 19, 2008. (aka FD 6010)			
	2/19/2008			
	MVA Report of Results: MVA 7380. "Analysis of Chrysler Brake for Asbestos," by Dr. James Millette. Date: February 19, 2008. (aka CHR 5109)			
	4/29/2008			
	"Asbestos Fibre Concentrations in the Lungs of Brake Workers: Another Look," by Murray M. Finkelstein. Published in <i>Am. Occup. Hyg.</i> pp. 1-7. Date: April 29, 2008.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2009 "Ford, General Motors, Chrysler, Asbestos, and a 'Sane Appreciation of the Risks,'" by David Egilman, MD, MPH. Published in <i>Int. J. of Occup. And Environ. Health</i> , Vol. 15, No. 1, pp. 103-04. Date: January/March 2009.			
	2009 "Occupation and cancer in the Nordic countries," by Aaron Blair. Published in <i>Acta Oncologica</i> , 48:644-645 (2009).			
	2009 "Occupation and cancer - follow-up of 15 million people in five Nordic countries," by Eero Pukkala, et al. Published in <i>Acta Oncologica</i> , 48:646-790 (2009).			
	2009 (Apr) MAS Study, "Running of a Brake Arc Grinder," April 2009. [Ammco Safe Arc grinder, model #2000, serial# 17052]			
	9/2/2009 MAS letter re. "Ammco Safe Arc - PLM Results for Asbestos."			
	No date [Ammco Safe Arc grinder, model #2000, serial# 17052] VIDEO: MAS Arc Grinding clip [Ammco Safe Arc grinder, model #2000, serial# 17052]			
	5/1/2009 National Cancer Institute (NCI) FactSheet, "Asbestos Exposure and Cancer Risk." Date: May 1, 2009.			
	7/29/2011 Deposition of Kathleen S. Corpus, taken July 29, 2011 in <i>Stillman, et al v. Allied Packing & Supply, Inc., et al</i> , No. RG10528222, in the Superior Court, Alameda County, California. (Depo + Exhibits A-N)			
	2012 Cely-Garcia, et al, "Personal Exposures to Asbestos Fibers During Brake Maintenance of Passenger Vehicles," <i>Ann. Occup. Hyg.</i> , Vol. 56, No. 9, pp. 985-999 (2012).			
	2012 Freeman & Kohles, "Assessing specific causation of mesothelioma following exposure to chrysotile asbestos containing brake dust," <i>Int'l J of Environ & Occup Health</i> , Vol. 18, No. 4, pp. 329-336.			
	2012 Jung, et al, "A Decade of Malignant Mesothelioma Surveillance in Korea," <i>Am J of Industrial Med</i> , pp. 1-7.			
	2012 (Apr) "Removing asbestos friction linings," published by Health and Safety Executive (HSE), April 2012.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2012			
	"Determining the Frequency of Asbestos Use in Automotive Brakes from a Fleet of On-Road California Vehicles," De Vita, et al. <i>Environmental Science & Technology</i> , (2012) 46, 1344-1351.			
	5/20/2013			
	"Mesothelioma and Employment in Massachusetts: Analysis of Cancer Registry Data 1988-2003," C. Roelofs, et al. <i>Am J of Indust Med</i> , pp.1-8, May 20, 2013.			
	1/1/2015			
	International Journal of Occupational and Environmental Health, "Asbestos-related Occupational Cancers Compensated under the Spanish National Insurance Systems, 1978 - 2011." Garcia-Gomez, et al.			
	1/1/2014			
	"Asbestos Exposure among Transmission Mechanics in Automotive Repair Shops," Ann. Occup. Hyg., Salazar, et. al., 2014.			
	No date			
	The New Hampshire Pollution Prevention Program, "Pitstops Manual, Best Management Practices for Automobile Service Facilities."			
	No date			
	Honeywell/Bendix MSDS (Material Safety Data Sheet). Product name: "Cured Organic Segment/Drum Brake - Asbestos." No date. (BX 5059)			
	No date			
	Disc brake assembly demonstratives			
	Drum brake assembly demonstratives			
	Clutch assembly demonstratives			
	Friction Literature (FMSI)			
	9/15/1971			
	Minutes of Meeting of the Asbestos Study Committee, dated September 15, 1971. (Exhibit 8 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>). (BX 5062, AB 209)			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	6/20/1972 Friction Materials Standards Institute, Inc. memo dated June 20, 1972, from E.W. Drislane to Members of Asbestos Study Committee regarding OSHA Standard-Position of Industry, NIOSH and Advisory Committee. Attached is a table titled "OSHA Regulations on Asbestos." (Exhibit 9 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>). (BX 423, AB 237)			
	8/8/1972 Memorandum from H.G. Donavan to N.W. Hendry, Subject: Bendix Corporation, Southfield, Michigan, Asbestos Health Seminar 8/8/72. [Authenticated by Affidavit of Margaret J. Baumgardner, 09/17/09, Bates# CRMC-SEG-007375 to 007381]. See also MC 5003. BX 5018. Abex 5019.			
	8/17/1972 Minutes of the meeting of the Asbestos Study Committee, August 17, 1972. (Exhibit 10 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>). (BX 13, AB 177)			
	8/30/1972 Memo from E.W. Drislane of FMSI to Asbestos Study Committee dated August 30, 1972 re attached Article, "Health Hazards of Asbestos" by J.C. Gilson. (Exhibit 11 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>). (BX 424, AB 242)			
	2/16/1973 Minutes of the Meeting of the Asbestos Study Committee on February 16, 1973 by E.W. Drislane of FMSI. (Exhibit 14 to Joel Charm depo 08/28/09 in <i>Anderson v. Borg Warner</i>). (BX 17, AB 278)			
	1973 "Brake and Clutch Emissions Generated During Vehicle Operation," by Jacko, DuCharme & Somers, presented at the Society of Automotive Engineers Meeting, May 14-18, 1973 in Detroit, MI. (BX 21)			
	5/21/1973 "Presentation on Asbestos by Dr. Irving J. Selikoff at American Industrial Hygiene Conference," Boston, MA - May 21, 1973. [Authenticated by Affidavit of Margaret J. Baumgardner, 09/17/09, Bates# CRMC-SEG-007388 to 007402]. See also MC 5005. BX 5020. Abex 5021.			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	6/1/1973 Minutes of the Meeting of the Asbestos Study Committee on June 1, 1973 by E.W. Drislane. (Exhibit 13 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). (BX 22,AB 280)			
	6/27-28/1973 Minutes of the annual meeting of the Friction Materials Standards Institute, Inc., June 27 28, 1973. Includes report: <u>Asbestos and the Friction Material Industry.</u> (Exhibit 15 & 16 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). (BX 23,AB 179)			
	6/14/1974 Unconfirmed Minutes of the Meeting of the Asbestos Study Committee on June 14, 1974 by Drislane. (Exhibit 21 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner).			
	8/8/1975 August 8, 1975, "Current Intelligence Bulletin 5, ASBESTOS, Asbestos Exposure During Servicing of Motor Vehicle Brake and Clutch Assemblies." From J. William Lloyd (Dept. of Health, Education, and Welfare) to "Colleague." (Exhibit 26 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). (BX 5067, ABEX 5013)			
	12/21/1976 Memo from E.W. Drislane to Asbestos Study Committee dated December 21, 1976 re attached Ballot on Recommended Procedures for Brake Servicing. (Exhibit 23 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). (BX 332,AB 276)			
	1977 Article entitled "Recommended Procedures for Reducing Asbestos Dust During Brake Servicing," published in FMSI Brake Lining & Clutch Facing Automotive Data Book, 1977. (Exhibit 30 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). (BX 40,ABEX 5015)			

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	Minutes of the meeting of the Asbestos Study Committee, March 28, 1977. (Exhibit 29 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). (BX 37, ABEX 5014)			
	Minutes of the meeting of the Asbestos Study Committee, January 19, 1978. (Exhibit 31 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). (BX 87, ABEX 5016)			
	Friction Materials Standards Institute, Inc. Minutes of the Asbestos Study Committee, August 3, 1978. (Exhibit 32 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner); [Authenticated by Affidavit of Margaret J. Baumgardner, 09/17/09, Bates# CRMC-SEG-007354 to 007361]			
	"Friction Materials Work Practices Guide," by Friction Materials Standards Institute, Inc. October 1978. [Authenticated by Affidavit of Margaret J. Baumgardner, 09/17/09, Bates# CRMC-SEG-007362 to 007373]. SEE ALSO MC 5002, BX 5069, ABEX 5018.			
	Minutes of the Meeting of the Health and Environmental Affairs Committee on October 25, 1979 written by E.W. Drislane of Friction Materials Standards Institute, Inc. (Exhibit 33 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). (BX 51, AB 298)			
	EPA/CPSC Workshop on Substitutes for Asbestos, July 14, 1980. "Non-Asbestos Friction Materials by Michael G. Jacko, et al (Bendix Corp.) (Exhibit 34 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). (BX 5068, ABEX 5017)			
	Article from the Asbestos Information Association, North American about the AIA. No date. (Exhibit 20 to Joel Charm depo 08/28/09 in Anderson v. Borg Warner). [Authenticated by Affidavit of Margaret J. Baumgardner, 09/17/09, Bates# CRMC-SEG-007383 to 007386]. See also BX 5065, Abex 5020, MC 5004.			
Friction Literature (Dust from Brake Boxes)				

PLAINTIFFS' EXHIBIT LIST

Plaintiffs Exhibit No.	Description	Admitted	Denied	Limited
	2/16/1973 Minutes of the Meeting of the Asbestos Study Committee on February 16, 1973 by E.W. Drislane of FMSI.			
2004	Abstract: "Evaluation of the size and type of free particulates collected from unused asbestos-containing brake components as related to potential for respirability," by MA Atkinson, et al. <i>Am. J. Ind. Med.</i> (2004).			
	Household and Environmental Exposure			
1913	"Safety - Methods for Preventing Occupational and Other Accidents and Disease," by William Tolman, et al. Harper & Brothers Publishers. (1913)			
1918	US Dept. of Labor/Bureau of Labor Statistics. "Mortality From Respiratory Diseases in Dusy Trades." by Frederick Hoffman. (June 1918)			
1932	The Journal of Pathology and Bacteriology, Edited by Boycott, et al. Vol. 35(1): 1-478 (1932)			
1934	The British Journal of Radiology. Vol. 7 (January to December 1934) "Pneumonoconiosis," by Philip Ellman.			
1934	"Standard Code of Industrial Hygiene," International Labour Office Studies and Reports. Published in the United Kingdom. (1934)			
1934	Tubercle, An International Monthly Journal Devoted to all Aspects of Tuberculosis. Vol. XV (1933-34)			
1937	"A Study of Dust Control Methods in An Asbestos Fabricating Plant," by Richard Page, et al. <i>Public Health Report</i> (November 26, 1937)			
1943	<u>Manual of Industrial Hygiene and Medical Service in War Industries</u> , by William Gafafer. Published by W.B. Saunders Company (1943)			
1943	"Halowax Acne (Cable Rash)," by Charles Good, et al. <i>Archives of Dermatology and Syphilology</i> , (September 1943)			
1943	Excerpt from <u>Manual of Industrial Hygiene</u> , by William Gafafer. (1943)			